
UNITED STATES DISTRICT COURT

for the
District of Oregon
Portland Division

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In the Matter of the Seizure of) Case No. 3:19-cr-00237-SI
One Check Made Payable to the United)
States Treasury in the Amount of)
\$300,000, Drawn on U.S. Bank Account)
No. *****2335)
)

**STIPULATION TO ISSUANCE OF WARRANT TO SEIZE PROPERTY
SUBJECT TO FORFEITURE**

I, Olaf Janke, defendant herein, having been found guilty as charged and in consideration of the United States' acquiescence in my travel to Germany (and locations incidental to such travel) from June 19, 2021, through July 8, 2021, do hereby stipulate that certain property, namely:

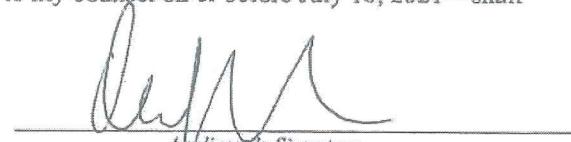
**one check made payable to the United States Treasury for the benefit of Olaf Janke and
drawn on account number *****2335 at U.S. Bank in the amount of three hundred
thousand dollars (and the funds on deposit represented thereby)**

is property which constitutes or was derived from proceeds traceable to the violations of Title 18, United States Code, Sections 1349 and 1956(h), as charged in the Information to which I have pleaded guilty, and is subject to seizure and forfeiture under Title 18, United States Code, Section 981(a)(1)(A), (C) and Title 28, United States Code, Section 2461(c). I further stipulate that the above-described property is properly subject to seizure as substitute property in lieu of other proceeds of the offenses charged in the Information, based on my own acts and omissions, pursuant to Title 21 United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b).

The facts supporting a finding of probable cause for issuance of a Seizure Warrant and forfeiture of the above-described funds are those that supported my plea of guilty to the Information, including the recitation of facts in the Plea Agreement executed on June 10, 2019, and filed with the Court on that date. In addition, I stipulate that I have remitted to my defense counsel, the law firm of Polsinelli PC, \$300,000 for the express purpose of funding the above-described check, and those funds are themselves traceable to proceeds of the above-referenced crimes.

These stipulations are made only for purposes of permitting the government to seize the above-referenced funds on or after this date, to hold said funds until I return to this District and return my passport to defense counsel on or before July 10, 2021, and to forfeit said funds if I do not do so (unless the United States Attorney's Office expressly agrees in writing and in advance of that date to an extension). The government has agreed to wire said funds back to Polsinelli PC forthwith upon my lawyer's confirmation that I have timely returned to this District and returned my passport to him. Following my timely return, the stipulations in this application shall be null and void and admissible for no purpose other than defending actions taken pursuant to this application and the terms hereof.

I have reviewed this stipulation with my counsel, Edward F. Novak, Esq., and execute it voluntarily and with the understanding and expectation that the United States shall seize the above-described funds and—if I do not return to the District of Oregon and surrender my passport to my counsel on or before July 10, 2021—shall irrevocably forfeit said funds.



Olaf Janke

Applicant's Signature
OLAF JANKE, DEFENDANT

I represent the defendant and have advised him of the consequences of this application and the stipulations herein. The above-described check represents funds remitted by defendant and neither I nor my firm have any independent claim to or interest in them.



Edward F. Novak

Defense Counsel's Signature
EDWARD F. NOVAK, ESQ.
POLSINELLI PC

The foregoing stipulations were attested to and the above signatures were adopted before me at a hearing in open court.

June 9
Date: May 9, 2021
Portland, Oregon



Michael H. Simon

Judge's signature
HON. MICHAEL H. SIMON
UNITED STATES DISTRICT JUDGE